

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

YONA SHAPOSHNIK and
PRISTINE MACHINE, LLC,

Plaintiffs,

Case No.: 2:16-CV-13945

v.

Honorable Victoria A. Roberts

HP ENTERPRISE SERVICES, LLC,

Defendant.

DEFENDANT'S PRELIMINARY FACT WITNESSES LIST

Pursuant to the Court's Scheduling Order (Dkt #23), Defendant HP Enterprise Services, LLC ("Defendant"), by and through its attorneys, provides a preliminary list of the fact witnesses who may testify at trial in this matter.

A) Known Witnesses

1. Yona Shaposhnik
2. Fred P. Schwartz, Esq.
3. Shlomo Weiss
4. Josef Sofer
5. Sarah Shaposhnik
6. Ephraim Carmen
7. Hallel Newman

8. Bradley (Scott) Moeller
9. Scott Doner
10. Alex Leonard
11. Pam Chappell
12. Bill Stephenson
13. Linda Teglash
14. Tammy Parker
15. Chris Caswell
16. Chuck Fowler
17. Bill Sheridan
18. Corey Wick
19. Shoumen Bardhan
20. Joseph (Drew) Miller
21. Rita Lauer
22. Carol Andre
23. Rule 30(b)(6) representative for Pristine Machine, LLC

B) Potential Witnesses

1. Plaintiff Yona Shaposhnik's medical providers and/or custodians of records from Mr. Shaposhnik's medical providers, who can testify regarding his claimed compensatory damages and documents relating to his claimed compensatory damages (not yet disclosed).
2. Individuals with knowledge of Plaintiffs' claimed compensatory

damages (not yet disclosed).

3. Custodian of records for the entities named or referenced in the pleadings.
4. Anyone identified by Plaintiffs or disclosed in any depositions, interrogatories, and/or written discovery in this case.
5. Any and all rebuttal and impeachment witnesses.

Defendant reserves the right to amend its preliminary list of fact witnesses as both its investigation and discovery continue.

Respectfully submitted,

Dated: September 1, 2017

By: /s Kelly A. Petrocelli
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been electronically filed this 1st day of September, 2017, with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following counsel of record for Plaintiffs:

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/s/ Kelly A. Petrocelli _____